

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	
)	No. 4:14CR00175 AGF
MARK PALMER,)	
SAMUEL LEINICKE, and)	
CHARLES WOLFE,)	
a/k/a "Chuck Wolfe,")	
Defendants.)	

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	No. 4:14CR00152 AGF
)	
CHARLES WOLFE)	
a/k/a "Chuck Wolfe,")	
Defendant.)	

**GOVERNMENT'S MOTION FOR ADDITIONAL TIME TO FILE RESPONSE
TO DEFENDANTS' MOTION FOR NEW TRIAL**

Comes now the United States of America, by and through Carrie Costantin, Attorney for the United States Acting under authority conferred by Title 28, United States Code, Section 515, for the Eastern District of Missouri, and James C. Delworth, Jennifer Winfield, and Erin Granger, Assistant United States Attorneys for said District, and for its Motion for Additional Time to File Response to Defendants' Motion for New Trial states as follows:

1. On October 17, 2017, a jury returned verdicts of guilt as to each defendant. Presently, sentencings are set for January 19, 2018.

2. Pursuant to Federal Rules of Criminal Procedure 33(b)(2), Defendants had fourteen (14) days from the date of verdict to file a motion for new trial.

3. On October 25, 2017, Defendants requested an extension to file a motion for new trial, up to and including, November 20, 2017. Thereafter, the Court granted their request for an extension. On November 20, 2017, Defendants filed a motion for new trial.

4. The Government is required to respond to Defendants' motion. Due to the number of issues and volume of material involved in the motion for new trial, as well as the undersigned's current workload, the Government requests additional time in which to present a comprehensive response to the Court.

WHEREFORE, Counsel for the Government respectfully request this Honorable Court to grant the government, up to and including **December 22, 2017**, in which to file a response to Defendants' motion for new trial.

Respectfully submitted,

CARRIE COSTANTIN
United States Attorney
Acting Under Authority Conferred by 28 U.S.C. §515

s/ Erin Granger
ERIN GRANGER, #53593MO
JAMES C. DELWORTH, #29702MO
JENNIFER WINFIELD, #53350MO
Assistant United States Attorneys

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing was served by way of this Court's electronic notification system on December 4, 2017 to all counsel of record.

s/ Erin Granger
ERIN GRANGER, #53593MO
Assistant United States Attorney